

RECEIPT # 56605  
 AMOUNT \$ \_\_\_\_\_  
 SUMMONS ISSUED \_\_\_\_\_  
 LOCAL RULE 4.1 \_\_\_\_\_  
 WAIVER FORM \_\_\_\_\_  
 MCF ISSUED \_\_\_\_\_  
 BY DPTY. CLK. \_\_\_\_\_  
 DATE BABSON COLLEGE

UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF MASSACHUSETTS

FILED  
 IN CLERK'S OFFICE  
 2004 JUN 15 P 2:16

U.S. DISTRICT COURT  
 DISTRICT OF MASS.

Plaintiff

vs.

Civil Action No.

PAUL D. REYNOLDS

Defendant

**04 - 11336 RCL**

and

MAGISTRATE JUDGE Bowler

JOHN AND JANE DOE(S)

Reach and

Apply Defendants

**NOTICE OF REMOVAL**

Pursuant to 28 U. S. C. §1441, defendant Paul D. Reynolds ("Reynolds") files this Notice of Removal and states:

1. Reynolds is the defendant in an action commenced against him by plaintiff in the Superior Court of the Commonwealth of Massachusetts for Suffolk County captioned Babson College v. Paul D. Reynolds and John and Jane Doe(s), Civil Action No. 04-2439-BLS2 (the "state action"). True copies of all process, pleadings and orders served on Reynolds in the state action are attached hereto as Exhibit A and specifically incorporated herein.

2. In its complaint, plaintiff Babson alleges that Reynolds's voluntary separation from Babson terminated his right to lawful possession of property, including confidential and proprietary information, relating to a certain Global Entrepreneurship Monitor (GEM) research project, that Reynolds possesses such property, and has thereby converted such property.